



July 2, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Oklo Inc.
Maximum Credible Accident Methodology Topical Report
Performance-Based Licensing Methodology Topical Report

Oklo Inc. (Oklo) is submitting to the U.S. Nuclear Regulatory Commission (NRC) a Maximum Credible Accident Methodology Topical Report and Performance-Based Licensing Methodology Topical Report, as Enclosures 1 and 2 to this letter. These topical reports represent specific methodologies used to develop the licensing basis for Oklo's Aurora at Idaho National Laboratory combined license application. These methodologies are being submitted, in part, to support alignment and mutual understanding between Oklo and NRC staff on key safety and design aspects of the licensing basis.

In addition to the role these topical reports provide for progressing the Aurora at Idaho National Laboratory combined license application review, they can also play a key role in the future licensing of advanced nuclear reactors. Congress recognized the significance of nuclear power's capabilities of mitigating the impacts of climate change by enacting the Nuclear Energy Innovation and Modernization Act (NEIMA) in 2019¹. NEIMA directs the NRC to develop a technology-inclusive licensing process for advanced nuclear reactors, enabling their timely and efficient deployment such that they can effectively contribute to the nation's decarbonization efforts. Oklo's licensing approaches support this exigent need by offering a set of performance-based licensing methodologies that are both technology-inclusive, but also enables both greater efficiency and stronger safety controls. It is therefore imperative that the NRC consider such approaches as it pursues regulatory framework development for advanced nuclear reactors.

It is in the public interest for the NRC to license plants with improved safety characteristics, in particular passive functions and inherent features. Further, it is in the public interest to ensure that regulatory controls are more efficiently and effectively applied directly to these functions and features. A better regulatory framework both ensures designs that are safe and facilitates the commercialization of advanced nuclear power.

In recognition of the additional role of these topical reports, on June 17, 2021, Oklo also submitted a fee waiver request (ML21168A377) for the review of these topical reports, which specifically details the basis of the request. Oklo looks forward to engaging with NRC staff to support a decision on this request.

¹ Nuclear Energy Innovation and Modernization Act, S.512, 115th Cong. (2019). <https://www.congress.gov/bill/115th-congress/senate-bill/512/>



If you have any questions or need any additional information, please contact us at regulatory@oklo.com or (650) 550-0127.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross Moore".

Ross Moore
Director of Regulatory Affairs
Oklo Inc.

A handwritten signature in black ink, appearing to read "John Hanson".

John Hanson
Director of Policies and Procedures
Oklo Inc.

A handwritten signature in black ink, appearing to read "Alexandra Renner".

Alexandra Renner
Director of Product
Oklo Inc.

Enclosures: (1) Oklo Maximum Credible Accident Methodology Topical Report
 (2) Oklo Performance-Based Licensing Methodology Topical Report

CC (with enclosure):

Jan Mazza, Project Manager, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

Donna Williams, Senior Project Manager, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

William Kennedy, Chief, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

William D. Reckley, Senior Project Manager, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

Nanette Valliere, Senior Project Manager, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

Robert H. Beall, Project Manager, Division of Rulemaking, Environmental, and Financial Support, Office of Nuclear Materials Safety and Safeguards

John Segala, Chief, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

Mohammed Shams, Director, Division of Advanced Reactors and Non-Power Utilization Facilities (DANU), Office of Nuclear Reactor Regulation

Rob Taylor, Deputy Director, Office of Nuclear Reactor Regulation

Andrea Veil, Director, Office of Nuclear Reactor Regulation

Ben Ficks, Deputy Chief Financial Officer, Office of Chief Financial Officer

Cherish K. Johnson, Chief Financial Officer, Office of Chief Financial Officer
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